

**REMARKS**

Claims 1-19 are pending in the application. Claims 1-6, 8-10, 12 and 14-16 are rejected.

**Claim Rejections - 35 U.S.C. §103(a)**

Claims 1, 3 and 5 are rejected under 35 U.S.C. §103(a) as being unpatentable over Wong in view of Dobuzinsky et al. (US Patent 5,412,246). The Examiner admits that Wong fails to disclose forming a second insulation film by plasma processing. The Examiner concludes that it would have been obvious to combine the teachings of Dobuzinsky et al. in view of Wong because the oxidizing agents such as nitric acid help remove defects.

Applicants respectfully disagree with the above rejections because there is no suggestion to combine the references.

Applicants note that Dobuzinsky et al. discloses forming an insulation film by low temperature plasma processing. Wong discloses forming a first isolation film by using a strong acid solution.

However, neither Wong nor Dobuzinsky et al. teaches the importance of combining both plasma processing and use of a strong acid solution. Applicants note that in thermal oxidation, since oxygen (O<sub>2</sub>) is used while the temperature is ramped up to a desired degree, an oxide layer is produced. Applicants submit herewith an attached reference: *Applied Physics Letter* P. 1256, lines 8-16 of right column, which shows the above principles. (This reference is merely submitted as clarification of the above statement; it does not directly affect the patentability of the present invention.) Applicants submit that there would be no need to combine the alternative

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processes of plasma oxidation and acid processing. One skilled in the art would not combine the teachings of Dobuzinsky et al. and Wong.

Therefore, Applicants submit that the obviousness rejection is not proper, and should be withdrawn.

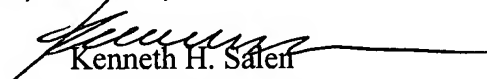
In view of the aforementioned amendments and accompanying remarks, Applicants submit that the claims, as herein amended, are in condition for allowance. Applicants request such action at an early date.

If the Examiner believes that this application is not now in condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney to arrange for an interview to expedite the disposition of this case.

If this paper is not timely filed, Applicants respectfully petition for an appropriate extension of time. The fees for such an extension or any other fees that may be due with respect to this paper may be charged to Deposit Account No. 50-2866.

Respectfully submitted,

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